



**Timothy G. Grosse**  
Manager  
External Affairs

**By Electronic Filing**

February 28, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

**RE: CPNI Certification**

**EB Docket 06-36**

Dear Ms. Dortch:

Attached to this letter is the Annual 47 C.F.R. § 64.2009(e) CPNI Certification and statement of procedures for operational compliance for North State Telephone Company, North State Communications Long Distance, LLC and North State Communications Advanced Services LLC, all of which are d/b/a North State Communications.

This filing was completed via the FCC's Electronic Filing System with a copy e-mailed to Best Copy and Printing. ([fcc@bcpiweb.com](mailto:fcc@bcpiweb.com))

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Grosse", written over a horizontal line.

Tim Grosse

**NORTH STATE COMMUNICATIONS**

**P. O. Box 2326, High Point, NC 27261 336-886-3600**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

Date signed: February 28, 2011

**Names of Companies Covered by this Certification:**

**499 Filer ID**

North State Telephone Company d/b/a North State Communications	806706
North State Communications Long Distance, LLC, d/b/a North State Communications	803194
North State Communications Advanced Services, LLC, d/b/a North State Communications	827546
North State Communications LLC, d/b/a North State Communications	Requested from USAC

Name of signatory: Royster M. Tucker, III

Title of signatory: President, Chief Operating Officer and Vice Chairman

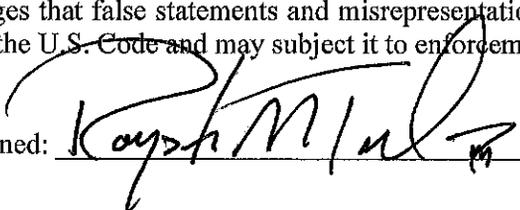
I, Royster M. Tucker, III, certify that I am an officer of the affiliated companies named above (collectively and individually "Company"), and acting as an agent of the Company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2010 or related to 2010. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 

Date: 2/28/2011

Attachment

**NORTH STATE COMMUNICATIONS**  
P. O. Box 2326, High Point, NC 27261 336-886-3600

<u>Names of Companies Covered by Statement</u>	<u>499 Filer ID</u>
North State Telephone Company, d/b/a North State Communications	806706
North State Communications Long Distance, LLC, d/b/a North State Communications	803194
North State Communications Advanced Services, LLC, d/b/a North State Communications	827546
North State Communications LLC, d/b/a North State Communications	Requested from USAC

**2010 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**  
**(EB Docket No. 06-36)**  
**February 28, 2011**

This statement serves to explain how the North State Communications telecommunication carrier affiliates named above (collectively and individually "Company"), are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2011).

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

**1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval

requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

**6. Record of Customer CPNI Approval/Non-Approval**

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

**7. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company provides customers with on-line access to customer account information for which the Company has initiated procedures to control access in compliance with Section 64.2010(c) comprising authentication through a password established in compliance with Section 64.2010(e).

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

**8. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable.      No actions taken against data-brokers.  
No customer complaints received.

**9. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**10. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

**11. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.